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7 **Attorney for Plaintiff**

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 **CHRISTI T. MORRELL,**

12 **Plaintiff,**

13 **vs.**

14 **ANDREW M. SAUL, COMMISSIONER**
15 **OF SOCIAL SECURITY,**

16 **Defendant.**
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Case No. 2:19-cv-00765-JCM-BNW

FIRST STIPULATION AND
18 **[PROPOSED] ORDER FOR**
19 **EXTENSION OF TIME TO FILE**
20 **MOTION FOR REMAND**

21 Comes now Plaintiff, by and through her attorney, JOSHUA R. HARRIS, ESQ., and
22 requests a THIRTY (30) calendar day extension of time, to file the **MOTION FOR REMAND**,
23 up to and including March 22, 2020.

24 Plaintiff's current deadline to file the **MOTION FOR REMAND** is February 21, 2020.

25 Plaintiff's counsel, for unknown reasons, did not receive the Administrative Record on
26 the disc and will request Defendant mail another copy to Plaintiff. Plaintiff apologizes for not
27 realizing the unreceived disc sooner.

28 Via e-mail on February 19, 2020 at 5:20 pm, opposing counsel expressed no objection to
the extension.

1 It is therefore respectfully requested that Plaintiff be granted a THIRTY (30) calendar
2 day extension of time to file the **MOTION FOR REMAND** up to and March 22, 2020.
3

4 DATED this 21st day of February, 2020.

5 /s/ Joshua R. Harris
6 **JOSHUA HARRIS, ESQ.**
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14 Attorney for Plaintiff

DATED this 21st day of February, 2020.

5 /s/ Allison J. Cheung
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13 Attorneys for Defendant

14 IT IS SO ORDERED.

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16 UNITED STATES MAGISTRATE JUDGE

17 DATED: 2/25/2020
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